

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

information associated with the Instagram ID: 318462056, Instagram ID: 2084990160, and Instagram ID: 60277130021 that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1 Meta Way, Menlo Park, California, 94025.

Case No. **23-M-546 (SCD)**

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin
(identify the person or describe the property to be searched and give its location):

Please see Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (*identify the person or describe the property to be seized*):

Please see Attachment B.

YOU ARE COMMANDED to execute this warrant on or before **1-5-24** *(not to exceed 14 days)*

☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Honorable Stephen C. Dries.
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (*check the appropriate box*)

☐ for _____ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of _____.

Date and time issued: 12-22-23. 9:40 am

Stephen C. Dai
Judge's signature

City and state: Milwaukee, WI

Honorable Stephen C. Dries, U.S. Magistrate Judge
Printed name and title

Return		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the **Instagram ID: 318462056**, **Instagram ID: 2084990160**, and **Instagram ID: 60277130021** that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1 Meta Way, Menlo Park, California, 94025.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Meta Platforms, Inc.

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta Platforms, Inc. (“Meta”), regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each user ID listed in **Attachment A**:

- (a) All contact and personal identifying information, including the full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers for user Account Name with the Usernames and Account IDs listed in **Attachment A**.
- (b) All activity logs for the account and all other documents showing the user’s posts and other Facebook or Instagram activities from **January 1, 2022, to present**;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;
- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook/Instagram group

identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook/Instagram applications;

- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user from **January 1, 2022 through present**, including all Messenger activity, private messages, chat history, video and voice calling history, and pending “Friend” requests;
- (g) All “check ins” and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account’s usage of the “Like” feature, including all Facebook/Instagram posts and all non-Facebook webpages and content that the user has “liked”;
- (j) All information about the Facebook pages that the account is or was a “fan” of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account from **January 1, 2022 through present**;
- (m) All information about the user’s access and use of Facebook Marketplace;
- (n) The types of service used by the user;

- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (p) All privacy settings and other account settings, including privacy settings for individual Facebook/Instagram posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook/Instagram and any person regarding the user or the user's Facebook/Instagram account, including contacts with support services and records of actions taken.
- (r) All content (whether created, uploaded, or shares by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), image stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from **January 1, 2022 to present.**
- (s) All content, records, and other information relating to communications sent from or received by the accounts in Attachment A including by not limited to:
 - a. The content of all communications sent from or received by the Accounts listed in Attachment A, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available.
 - b. All records and other information about direct, group, and disappearing messages sent from or received by the Accounts listed in Attachment A including dates and times, methods, sources, and destinations (including

usernames and account numbers), and status (such as delivered, opened, replayed, screenshot)

- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants
- d. All associated logs and metadata,
- (t) All content, records, and other information relating to all other interactions between the Accounts listed in Attachment A and other Instagram users from **January 1, 2022** through **present** including but not limited to:
 - a. Interactions by other Instagram users with the Accounts listed in Attachment A or its content, including posts, comments, like, tags, follows (including follows unfollows, approved and denied follow requests, and blocks and unblocks), shares invitations, and mentions
 - b. All users the Accounts listed in Attachment A has followed including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the account
 - c. All contacts and related sync information
 - d. All associated logs and metadata

Meta is hereby ordered to disclose the above information to the government within 10 days of issuance of this warrant.

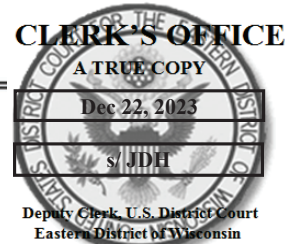
II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. § 1951(a) (Hobbs Act robbery), 18 U.S.C. § 924(c) (possessing and/or brandishing a firearm during a crime of violence) involving ABDI MOHAMED, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- (a) The relevant offense conduct, any preparatory steps taken in furtherance of the scheme, communications between HUSSEIN HAJI, HURIA ABU, JESSIE COOK, ABDI BABA, ABDI MOHAMED and others related to the relevant offense conduct of illegal use and possession of firearms and carjacking;
- (b) Evidence indicating how and when the Facebook/Instagram account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook/Instagram account owner;
- (c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s); and
- (e) The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the sale of firearms and sale and use of controlled substances, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits,

and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.



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Case No. **23-M-546 (SCD)**

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Please see Attachment A.

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 1951(a)	Hobbs Act Robbery
18 U.S.C. § 924(c)	Brandishing a Firearm during a Crime of Violence

The application is based on these facts:

Please see Affidavit.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Heather Wright, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 telephone _____ (specify reliable electronic means):

Date: 12-22-23

Judge's signature

City and state: Milwaukee, WI

Honorable Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Heather N. Wright, being first duly sworn on oath, hereby depose and state as follows:

INTRODUCTION, BACKGROUND, TRAINING, AND EXPERIENCE

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook or Instagram user ID that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), a social networking company headquartered at 1 Meta Way, Menlo Park, California, 94025. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Meta to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since July of 2010. Since August of 2020, I have been assigned to the FBI’s Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

3. Based on my training and experience, I know that criminal investigations have been aided by subpoenas, warrants, and court orders related to electronic communication records by providing critical investigative leads and corroborative evidence.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on the investigation to date and the facts as set forth in this affidavit, I submit that there is probable cause to believe that HUSSEIN A. HAJI (XX/XX/2001)), HURIA H. ABU (XX/XX/2002), JESSIE L. COOK (XX/XX/2003), ABDI A. ABDI, (XX/XX/2001), DARRION ALLISON, (XX/XX/2000) ABDI I. BABA (XX/XX/1998), ABDI A. MOHAMAD, dob: XX/XX/1996, and others, committed the armed robberies of United States Post Office mail carriers on October 25, 2022, near 2650 N. Martin Luther King Drive, Milwaukee, on December 7, 2022, near 3205 N. Bremen Street, Milwaukee, on February 10, 2023, near 5273 N. 27th Street, Milwaukee, on March 13, 2023, near 4548 N. 38th Street, Milwaukee, on March 28, 2023, near 4616 W. Hope Avenue, Milwaukee, and on August 29, 2023, near 1833 W. Galena Street, Milwaukee, Wisconsin. These offenses are in violation of violations of Title 18 U.S.C. § 1951(a), Hobbs Act Robbery, and Title 18 U.S.C. § 924(c), Brandishing of a Firearm during a Crime of Violence. There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

PROBABLE CAUSE

A. Postal Carrier Robbery Sprees and Initial Investigation:

6. On October 25, 2022, the Milwaukee Police Department responded to an armed robbery complaint at 2650 N. Martin Luther King Drive, Milwaukee, Wisconsin. Upon arrival, officers spoke with the victim, identified as a United States Postal mail carrier, hereinafter referred to as D.D. D.D. stated that he had been conducting his route at approximately 2:30 P.M., and was about to start at 2500 N. Richards Street, when he was approached by four young males. D.D. described Subject #1 as possibly a Hispanic male, approximately 19 years old. D.D. stated that Subject #1 and three other males approached him from behind and demanded that he “give up his shit.” D.D. stated that he heard one of the subjects say that they had a gun to his back. D.D. stated that he told the subjects that he was not going to give them anything and quickly turned around to face the attackers, fearing that one of them may have a gun. D.D. stated that he did not observe any of the subjects with a firearm and immediately took a fighting stance. Three of the subjects ran away, while Subject #1 stayed and took a fighting stance as well. D.D. stated that as Subject #1 attempted to punch D.D., D.D. attempted to punch Subject #1. D.D. stated that he was unsure if his punch made contact with Subject #1, however, Subject #1 staggered back and ran away. D.D. stated that Subject #1 ran eastbound and eventually northbound towards the alley. D.D. stated that he chased after Subject #1, however, he lost sight of Subject #1 and returned to his vehicle. D.D. stated that when he returned to his vehicle, he was unable to find his USPS issued Arrow key that had been hanging around his neck on a lanyard.

7. On January 28, 2023, a photo array was presented to D.D. with the target of the photo array as JESSIE L. COOK (dob: XX/XX/2003). D.D. identified COOK as the individual that had demanded his things and attacked D.D. on October 25, 2022.

8. On December 7, 2022, the Milwaukee Police Department responded to 3205 N. Breman Street, Milwaukee, Wisconsin, for an armed robbery of a United States postal mail carrier, hereinafter referred to as E.V. E.V. stated that at approximately 3:00 p.m., he had just finished delivering mail to 3219 N. Breman Avenue and was walking south towards the next block when he passed two subjects who were walking northbound on the west sidewalk. E.V. stated that after they had passed, he could hear running footsteps approaching him from behind and he turned around. The same two subjects that had just passed him ran up to him and one had a gun pointed at him.

9. E.V. stated that Suspect #1 said “Gimme everything...gimme everything...gimme everything,” while pointing a small-framed semi-automatic hand gun at him. E.V. stated that he provided his ID and keys that were on a lanyard around his neck as well as the mail in his hands. E.V. stated that the key fob for the postal van as well as his Arrow key were on the key ring that was provided. The Arrow key was specifically assigned to E.V. that day and can open the blue mail boxes and some boxes at apartment buildings. E.V. stated that the serial number for the key provided was #30411. E.V. stated that Subject #2 took the ID with the keys attached but dropped the mail E.V. had handed to him. E.V. stated that he attempted to hand the Subjects his mail bag because it had scanned devices within the bag that could be GPS located, however, the subjects were not interested and were only interested in the lanyard and keys. E.V. stated that he then ran to a corner bar for safety and called the police. E.V. stated that the subjects ran southbound and heard a car squeal off in a hurry.

10. Shortly after the incident, a witness approached him and told him that he saw the suspects get into a white Nissan Murano. That particular witness could not stay on scene. However,

an additional witness also came forward and stated that they had observed the robbery and corroborated that she, too, had observed the suspects enter a white Nissan Murano.

11. A canvas for video surveillance was completed and video surveillance from a Ring doorbell was obtained at 3219 N. Breman Street. After a review of the video, Subject #1 was observed to be a black, male, late teens, approximately 5'10" tall, thin build, dark complexion, wearing a black hoody, black mask (above eyes showing), light gray pants, black shoes, armed with a black semi-automatic handgun. Suspect #2 was observed to be a black, male, late teens, approximately 6'0" tall, thin build, medium complexion, wearing a black hoody, black mask (above eyes showing), black pants, white shoes, unknown if armed.

12. On January 27, 2023, a state residential search warrant related to a drug investigation was executed at 2519 N. Buffum Street, Milwaukee, Wisconsin. Prior to the execution, two black males and two black females were observed leaving the residence in a blue Toyota Camry. Shortly thereafter and just prior to the warrant execution, the blue Toyota returned with two of the four individuals inside. When officers approached the vehicle, they identified the individuals as MARVIN TURNER (dob: XX/XX/2000) and HUSSEIN A. HAJI (dob: XX/XX/2001). Officers then executed the search warrant and identified HURIA H. ABU (dob: XX/XX/2002), JESSIE L. COOK (dob: XX/XX/2003), AMAURIE D. SMITH (dob: XX/XX/2005) as well as two females who were not residents of the house, hereinafter "S. J". and "S. W.". A search of the residence resulted in the recovery of a Glock 19 handgun (stolen out of Cudahy), a loaded Ruger P95 handgun, a loaded Ruger PC Charger carbine pistol, a loaded AK 7.62 cal pistol, a GSG rifle upper with mock silencer, hundreds of pieces of stolen mail including about 900 personal and commercial checks from Milwaukee, Shorewood, Brookfield, Brown Deer, as well as others. They further located checks being "washed" in acetone, keys on a bed

located in a bedroom that unlocked a safe which contained \$7000, (1) USPS arrow key, (1) set of USPS keys, (20) cellular telephones, and (2) laptop computers. Officers also located keys for a Nissan Murano that unlocked a white Nissan Murano parked outside the residence and matched the vehicle description used in the October 25, 2022 and December 7, 2022 robberies.

13. Following the arrests of HAJI, COOK, ABU, SMITH and TURNER, interviews were conducted. During the interview of COOK, COOK stated to detectives that he was the primary user of the Nissan Murano located at the residence during the execution of the search warrant. COOK admitted to being involved in the robbery of the postal carrier on October 25, 2022. COOK stated that COOK was the individual that punched the postal carrier during the robbery, however, COOK would not state why the mail carrier was targeted or who he was with during the robbery. COOK stated to detectives that he was the owner of a Samsung Galaxy 20 black cellular phone with telephone number 262-389-0018.

14. During the interview of HAJI, he admitted to detectives that he had participated in the robbery of the mail carrier that had occurred on December 7, 2022. HAJI stated that ABU was the driver, and that COOK had the gun and pointed it at the white mail carrier. HAJI stated that they used the Nissan Murano, and that HAJI was the individual that took the arrow key from the mail carrier. HAJI also admitted to Detectives that they were after the specific arrow key that mail carriers carry during the robbery. HAJI stated that HAJI, COOK, and ABU participated in “mail runs”, which are when a person removes mail from mailboxes. HAJI stated that he has participated in approximately 40 mail runs in at least four different vehicles. HAJI stated that the target of the mail runs are personal checks and that they sell them after they are located. HAJI stated that one of the methods of payment when selling the checks is CashApp. HAJI stated that the day he was arrested, he was taken into custody outside of the residence because he had been inside the Toyota.

HAJI stated that his firearm was located inside the Toyota on the passenger side floorboard. HAJI stated that he has owned the firearm for approximately one year and purchased it at the Shooter's club. HAJI stated that the last time he shot the gun was on New year's outside the house at 2519 N. Buffum Street at midnight on New Year's Eve. HAJI stated that he had fired the gun into the air.

15. On February 2, 2023, a Wisconsin state search warrant was obtained for all the cellular phones seized during the search warrant executed at 2519 N. Buffum Street. A review of the phones indicated that HAJI had obtained an arrow key, was using the arrow key to open mailboxes, steal personal checks from unwilling victims, and re-writing the checks to bank accounts associated to HAJI or another that HAJI had recruited to deposit the stolen check.

16. A review of the cellular phones determined that ABU utilized the **Instagram username: riodinero.jr** with the **Instagram ID# 31452828829** (this account was located by FBI analysts and a photo of shoes with money as the profile picture was observed). On May 15, 2023, I swore to an affidavit requesting the authorization of a search warrant for ABU's Instagram and on May 15, 2023, the search warrant was authorized by the Honorable United States Magistrate Judge William E. Duffin. On June 8, 2023, writer received the results of the search warrant from Facebook and reviewed the results.

17. On February 10, 2023, the Milwaukee Police Department responded to an armed robbery that had occurred near 5273 N. 27th Street, Milwaukee, at approximately 11:40 A.M. The victim was identified as a United States Postal carrier, hereinafter referred to as N.M. N.M. stated that he had been working mail route 88, had parked his mail vehicle near 2626 W. Rhor, and walked to the door to deliver the mail. N.M. stated that as he began to approach the residence of 5273 N. 27th Street from the north, he walked onto the small porch to place mail into the boxes.

N.M. stated that he then observed three subjects come from the backyard (from the west of where he was) and surrounded him as he was on the porch. N.M. stated that he was somewhat trapped due to the railings on the porch and the three subjects surrounding him. N.M. stated that he had the ring of apartment keys in one pocket of his outer most jacket and the chain was exposed across his jacket leading to the Arrow key that was in the opposite pocket of his jacket.

18. N.M. described Subject #1 as a black male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, aviator sunglasses with plastic frames and gray/black lenses, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine. N.M. described Subject #2 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck with his eyes exposed, "beach style" square sunglasses, a black hooded sweatshirt, dark blue jeans, unknown shoes, armed with a black Glock 9mm handgun with a tan extended magazine and switch attached to the back of the gun. N.M. stated that N.M. knew the term "switch" to be an added part on a gun that makes the firearm fully automatic. N.M. described Suspect #3 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine.

19. N.M. stated that Suspect #1 was armed with a gun which he held at his side when he demanded N.M.'s keys. N.M. stated that he held up his hands while Suspect #1 grabbed the chain that was exposed outside of his jacket and took N.M.'s keys. N.M. stated that Suspect #2 approached him, used his gun to push up the brim of N.M.'s hat, and asked N.M. what else he had. N.M. stated that he told the suspect that he didn't have anything else. N.M. stated that Suspect #3

did not say anything to him or touch him, but was armed with a gun in his waistband and positioned himself with the other two Suspects. N.M. stated that after the suspects obtained N.M.'s keys, all three suspects fled on foot in the same direction they had approached. N.M. stated that he heard car doors opening and a vehicle drive away but he did not look into the alley to obtain a vehicle description nor which direction they fled.

20. A canvas for surveillance video was conducted and Ring video was located at 5248 N. 27th Street as well as surveillance video from 2800 W. Custer Ave. During the collection of the Ring video, officers were able to observe at 11:41AM, a white 2007-2012, 4 door, Nissan Altima driving southbound through the alley at a high rate of speed. The vehicle had tinted windows (including front window brow only), a sunroof, side window deflectors, six spoke aluminum rims (split spokes), damage to rear passenger bumper/quarter panel, damage to front passenger quarter panel, dual exhaust, and front and rear unknown registration plates. During a review of the surveillance video obtained from 2800 W. Custer, Officers observed the white Nissan Altima approach the alley at 11:38 A.M., from the west and drive southbound in the alley. Multiple suspects can be observed exiting the vehicle and proceed towards where the victim was robbed. The white Nissan continues southbound in the alley following the incident.

21. On February 13, 2023, at approximately 2:52 PM., a law enforcement member of the Milwaukee Area Violent Crimes Task Force (MAVCTF) observed a vehicle matching the above description driving west on North Avenue from 73rd Street. The vehicle was a 2010 Nissan Altima 4 door (WI plate AJF-7039). The vehicle subsequently pulled into the Brother's Plus Grocery Store located at 4020 W. North Avenue. Task Force Officers (TFOs) observed a thin black male with shoulder length dreads exit the vehicle's front passenger door and enter the business. The subject was wearing a black T-shirt, camouflage pants, and white/black shoes. The

subject then exited the store and re-entered the Altima's front passenger door. TFO Strasser obtained a short video of the subject during the course of the surveillance.

22. The vehicle was then observed driving to and parking in the rear 2225 N. 35th Street. Task Force Officers were able to run the plate and noted that the vehicle listed to ABDI BABA (dob: 01/01/1998), with an address of 2303 W. Cherry Street. This same vehicle was observed via a law enforcement camera system at West Silver Spring Drive and North Green Bay Avenue on February 10, 2023, at 11:08 A.M. The robbery occurred on February 10, 2023, at approximately 11:41 A.M and is 0.9 miles away from the West Silver Spring Drive and North Green Bay Avenue intersection.

23. A short video clip of the surveillance of the subject that was observed getting in and out of the Nissan Altima was shown to TFO Dolan, who was able to identify the subject as HURIA H. ABU, a subject that had been arrested during a related investigation on January 27, 2023. TFO Dolan was able to identify the subject as ABU, based on his prior interactions with him.

24. On February 14, 2023, a state search warrant was obtained for a GPS tracker in order to identify location information for the 2010 Nissan Altima 4 door (WI plate AJF-7039), identified by law enforcement as the suspect vehicle in the February 10, 2023, armed robbery. On Friday March 3, 2023, a GPS was attached to the vehicle and the GPS began providing location information. Along with officers observing and locating the vehicle at 2303 W. Cherry Street in order to place the GPS onto the vehicle, during the monitoring of the GPS, Task Force Officers have observed the vehicle and monitored the vehicle's GPS location at the Cherry Street address on numerous occasions.

25. On March 13, 2023, Law Enforcement members of the MAVCTF and Milwaukee Police Officers responded to an armed robbery of a United States Postal carrier near 4548 N. 38th Street, Milwaukee. The victim, identified and hereinafter referenced as M.P., stated that at approximately 1:00 p.m., he parked his truck at 4501 N. 38th Street on the west side of the street, facing south. M.P. stated that while delivering mail at 4514 N. 38th Street, he observed two black male suspects on the west side of the street walking southbound. M.P. stated that the two seemed suspicious because they had masks on. M.P. stated that the two suspects walked past his truck, then walked in front of his truck eastbound. The suspects then went north on the east side of N. 38th Street. M.P. stated that he later observed them duck by the houses near 4518 N. 38th Street while he was further north delivering mail.

26. M.P. stated that when he got near 4548 N. 38th Street, he observed the two suspects running at him. M.P. described Suspect #1 as a black, male, approximately 16 years old, approximately 5'4" tall, short, thin build, wearing a dark royal blue coat, black running pants, armed with a Draco styled gun with a wooden stock. M.P. described Suspect #2 as a black, male, approximately 6'0" tall, light complected, wearing a black jacket and black jogging pants. M.P. stated that one of them stated "don't run now bitch." M.P. stated that Suspect #1 pointed the gun at his head and said, "Give me the keys. Give me the keys. I'll shoot you." M.P. stated that they tried grabbing his keys from the right side of him, but they were on a lanyard. M.P. stated that he told them that the keys were on a lanyard, so they unclipped them and ran northbound from the location and continued eastbound on W. Glendale.

27. A witness to the incident, hereinafter P.M., stated that she heard talking outside and looked out her front window and observed the postal carrier running. She stated that she got up to the storm door and observed two suspects, one of which had a gun pointed at the postal carrier and

was wearing a blue coat. P.M. stated that she heard the postal carrier say “ok..ok” but did not hear what the suspects were saying. P.M. stated that she then grabbed her three-year-old nephew and pulled him to the ground for fear that shots would be fired. P.M. stated that she waited for the suspects to leave and called the police.

28. Video surveillance was obtained from the Hopkins Food Mart located at 4601 N. Hopkins Street, Milwaukee. The cameras were located on the south side of the business and the east side of the business. MACTF investigators observed a 2009 silver Honda Civic with front and rear plates, no sunroof, damage to front driver’s quarter panel, 7 spoke hubcaps, broken front driver hubcap, with the front passenger inner headlight on (others defective), circling the block and fleeing the area of the robbery, just after it took place.

29. An attempt to identify the vehicle was conducted by querying FLOCK and ALPR cameras in the area with a similar suspect vehicle description. A hit on a 2009 Honda Civic 4 door, WI plate ABG-8200, was obtained at several times on March 13, 2023 at the following locations:

- a. 16:26 – 21 SWE W. Fond Du Lac at Capital Ave.
- b. 13:36 – #01 N/B Port Washington @ Hampton Ave
- c. 12:19 – #10 MLK & W North – S/B
- d. 11:42 – 25 S/B N. Sherman at W Hampton
- e. 8:33 – 07 S/B N. 35th Street at W. Wisconsin

30. The vehicle listed to a Mohammed F. Omar (dob: XX/XX/1990) of 1809 W. McKinley Avenue, Milwaukee.

31. A Milwaukee Police database query was then done for the Wisconsin plate ABG-8200. A call for service regarding a subject with a gun and shots fired was received on January 2, 2023 near North Buffum Street and East Wright Street. A second caller then called and reported

that her house had been struck by gunfire at 2513 N. Buffum Street. Officers responded and ran all vehicles in the area including a silver 2009 Honda Civic, WI plate ABG-8200, which was parked in front of 2519 N. Buffum Street (next door to 2513 N. Buffum, and also struck by the gunfire) when officers arrived. A body camera review of the responding officer was reviewed by investigators and the 2009 silver Honda was also observed driving by the officer at 10:42 a.m. on January 2, 2023.

32. On March 14, 2023, an offline search of the 2009 Honda Civic, WI plate ABG-8200, was done and on December 19, 2022, the vehicle was run by Whitefish Bay Police Department. Your affiant contacted Whitefish Bay Police Department on March 14, 2023 and confirmed with Whitefish Bay Detective Joe McLeod that the vehicle was traffic stopped on December 19, 2022 at 9:48 p.m., at the intersection of Santa Monica and W. Silver Spring Drive in Whitefish Bay, for speeding, driving without a license, and failure to stop at a stop sign. The driver of the vehicle was identified as HURIA H. ABU, dob: XX/XX/2002. ABU provided Whitefish Bay with a home address of 2519 N. Buffum Street. During a review of the body cam of Whitefish Bay officers during the traffic stop, ABU can be observed speaking with officers in the driver's seat of the vehicle. During the interaction, ABU was observed holding a cellular telephone with a red case. ABU provided officers with the cellular telephone in order to provide a photo of his identification card. Again, the cellular telephone can be seen being handed to the Whitefish Bay officer by ABU in a red case. The cellular telephone is then handed back to ABU by the officer. ABU also provided officers with his home address of 2519 N. Buffum Street in Milwaukee.

33. Following the arrest of COOK, ABU, SMITH, TURNER, and HAJI, on January 25, 2023, only COOK and HAJI were held in state custody. All others were released and on

February 10, 2023, the next robbery of a United States Postal carrier for his Arrow key occurred. The suspect vehicle in that robbery was the 2010 Nissan Altima 4 door (WI plate AJF-7039) registered to BABA who is associated to ABU. ABU was observed on February 13, 2023, exiting the Altima during a law enforcement surveillance. The suspect vehicle of the United States Postal carrier robbery on March 13, 2023 was identified as a 2009 Honda Civic 4 door (WI plate ABG-8200). ABU was stopped by Whitefish Bay Police Department on December 19, 2022, driving this suspect vehicle.

34. On March 20, 2023, I swore to an affidavit requesting Timing Advance “True Call” area search for all records and unique device/user identifiers pertaining to Timing Advance location information of the February 10, 2023 armed robbery of the mail carrier at 5273 N. 27th Street at around 11:40 a.m., and the February 10th law enforcement camera plate identification of the suspect vehicle at W. Silver Spring Drive and N. Green Bay Avenue around 11:41 a.m.. I received the results for that warrant from T-Mobile on March 28, 2023.

35. On March 24, 2023, surveillance was conducted by the FBI Surveillance Operations Group of the 2009 silver Honda Civic. FBI SOG members observed the driver of the vehicle, later identified as ABDI A. ABDI, dob: XX/XX/2001, exit the Honda Civic at the Fast and Friendly Grocery Store located at 311 W. Locust Street, Milwaukee. FBI SOG members observed ABDI exit the location and return to his vehicle. While walking to his vehicle, FBI SOG members took photographs of ABDI exiting the location and were able to observe what appeared to be registration plates and a registration sticker in his left hand.

36. Later that same day, a traffic stop of the silver 2009 Honda Civic was conducted by the Milwaukee Police Department for expired registration tags affixed to the vehicle. The driver of the vehicle was identified as ABDI, indicated to officers, that the vehicle was registered in his

name and had just obtained new plates and registration for the vehicle. ABDI indicated that the new plates for the vehicle were WI plate ASV-4406. Officers observed two other occupants inside the vehicle and identified the individuals as ABU and DARRION M. ALLISON, dob: XX/XX/2000. While officers were obtaining contact information for the individuals inside the vehicle, ABU indicated that his telephone number was 262-264-0206, ABDI indicated that his telephone number was 262-283-2100, and ALLISON indicated that his telephone number was 414-588-5392. Officers then released the vehicle without incident.

37. On March 27, 2023 at 12:20 am, Butler Police Department (BPD) Officer Knapp observed a suspicious vehicle, later identified as a silver 2009 Honda Civic, parked on the west side of N. 125th Street facing south with a defective head lamp and dark tinted windows. Officer Knapp ran the registration of the vehicle, WI plate ASV-4406, and the registered owner came back to ABDI, with a listed address of 5230 N. Sherman Blvd #23 in Milwaukee. A DOT check of ABDI revealed that ABDI had a suspended license for a failure to pay a forfeiture.

38. Officer Knapp turned his marked squad around and the vehicle pulled away from its parked position southbound N. 125th Street towards W. Hampton Avenue. As he was attempting to catch up to the vehicle to conduct a traffic stop for an equipment violation, Officer Knapp observed a male subject, later identified as ABDI, running from west side of N. 125th Street across N. 125th Street, eastbound in the alley behind Butler Auto Care, 12432 W. Hampton Avenue and south of 4820 N. 125th Street. While checking the area, Officer Knapp located ABDI and the other male subject, identified verbally as DARRION M. ALLISON, dob: XX/XX/2000, walking northbound on the west side of the street through the snow along N. 124th Street in front of 4935 N. 124th Street.

39. After losing sight of both subjects, Officer Knapp regained eyes on the subjects and made contact with the individuals, who verbally identified themselves as ABDI and ALLISON. ALLISON told Officer Knapp that they were trying to get to the store. Officer Knapp then spoke to ABDI and asked why someone was driving his vehicle. ABDI told Officer Knapp that everyone was “good” and indicated that his cousin was driving his vehicle with his permission. Upon obtaining ABDI and ALLISON’s identifying information, ABDI stated that his telephone number was 262-283-2100 and ALLISON indicated that his telephone number was 414-588-5392. Officer Knapp then indicated to ALLISON and ABDI that they were free to leave.

40. After ABDI and ALLISON were released, Officer Knapp, again checked the area and observed the suspicious 2009 Honda Civic return. Officer Knapp activated his emergency lights and conducted a traffic stop on N. 125th Street, just south of W. Stark Street. Officer Knapp made contact with the driver, identified as HURIA H. ABU, dob: XX/XX/2002, and informed him of the reason for the traffic stop. Officer Knapp smelled a strong odor of marijuana inside the vehicle. ABU stated that he was in the area to obtain gas and that he was just “chilling” there and that “I always park right here.” Prior to walking back to his squad vehicle, ABU told Officer Knapp that Officer Knapp could check the vehicle out. Officer Knapp then searched the vehicle via consent from ABU. Officer Knapp located a box of blue latex gloves, 21.9 grams of a green leafy substance that later field tested positive for THC, a black and multicolor backpack containing a black Nike ski mask and (17) personal checks made out to various individuals issued from various individuals, most of whom resided in the City of Milwaukee. Officer Knapp also located (55) unused “cannabis flower” Ziplock bags, a box of 9mm Federal ammunition containing (20) unused round, a black and red digital scale, and (2) additional checks in the glovebox along with (2) money orders totally \$150 USC.

41. Officer Knapp also located (4) Apple iPhones inside the vehicle. One of the Apple iPhones had a red/black case with ALLISON's driver's license in the case pocket on the back side of the phone. The second iPhone (blue back with no scratches or cracks) was in the same spot that ALLISON's iPhone was located. This phone appeared to be brand new and not set up. The third phone was an iPhone that had a silver back with no case. This was the cellular phone on ABU's person when he exited the vehicle and placed it on the trunk of the vehicle. When the home screen turned on, there was picture of ABU wearing a white T-shirt with black pants holding money. The fourth iPhone located, had a blue cracked back and pieces missing along with the lower front screen that was cracked. This phone was on the front passenger seat. There were no identifying serial numbers or model numbers observed on the outside of this phone. This phone was not in a case.

42. Following the search of the vehicle. ABU was taken into custody and cited for possession of marijuana as well as possession of drug paraphernalia. ABU was transported to the Waukesha County Jail for booking and then released.

43. Later that day, on March 27, 2023, Officer Knapp went back to the area of the location where ABDI and ALLISON had been questioned and observed (2) blue latex gloves on the east side of 4935 N. 124th Street. One of the blue latex gloves was located on the south side of the driveway entrance and the second glove was located on the north side of the driveway entrance.

44. On March 28, 2023, after speaking with your affiant about the circumstances regarding the investigation on ABU as well as others, BPD Captain Brian Zalewski obtained video surveillance from the Village of Butler Town Hall. Captain Zalewski reviewed Village of Butler Town Hall security cameras during the timeframe of Officer Knapp's contact with ABU, ALLISON and ABDI. At 12:18:30 AM, the camera activated (as it is motion censored) as two

subjects were observed next to, on the north side of, the blue mailbox in front of the Post Office. One subject was squatting down and appeared to be tampering with the bottom half of the mailbox. The second subject, who was the taller of the two, was standing behind the first subject. It should be noted that the blue mailbox had the lock and key access on the lower half of the side of the box facing north. At 12:18:32 AM, the subject squatting down stands up and both subjects began to walk towards N. 125th Street. The camera stopped recording at 12:18:45 AM.

45. Following a review of video surveillance, Captain Zalewski contacted the post master of the Butler Post Office, Karen Monreal, located at 12420 W. Hampton, one block from where the 2009 Honda Civic was parked the previous morning when ABU was arrested. Captain Zalewski stated that Monreal stated that the top of the bin in the front mailbox contained numerous small packages, election ballots, and a small amount of mail located underneath the packages, however, based on her many years of experience working at this post office, the bin in the mailbox would normally be overflowing after the weekend. On that day, she considered the amount of mail lighter than the normal load.

46. On March 28, 2023, prior to returning the aforementioned cellular phones that were recovered from the Honda Civic to their owners, Captain Zalewski called the telephone numbers provided by ALLISON and ABDI and the associated cellular telephone did ring and confirm that the cellular number provided by ALLISON and ABDI, were indeed, the telephone numbers assigned to those cellular telephones.

47. Also on March 28, 2023, prior to ABU, ALLISON, and ABDI picking up their cellular telephones at approximately 4:45 p.m., an armed robbery of a mail carrier occurred at 4616 W. Hope Avenue, Milwaukee, Wisconsin. The victim, hereinafter A.A., was delivering mail at the location, when two suspects approached her while on the porch of the residence. Suspect 1 was

decribed as a black, male, approximately 17 years old, approximately 5'5". With a slim build, wearing a gray hooded sweatshirt with the hood up, skinny blue jeans, and armed with a black semi-automatic hand gun in his right hand. Suspect 2 was described as a black, male, approximately 18 to 20 years old, approximately 5'4", and a stocky build. Suspect 1 pointed a black semi-automatoc handgun at A.A.'s chest and demanded her keys multiple times. A.A. stated that Suspect 1 began to search the pockets of the USPS vest that A.A. was wearing and removed her personal Android phone, the key fob to the USPS mail truck, which was parked down the street, and removed a USPS tracking device that was on a strap around her neck. A.A. stated that the two suspects fled from the scene on footwestbound on Hope Avenue and then south on N. 48th Street.

48. On April 23, 2023 and into April 24, 2023, Members of the Milwaukee Area Violent Crimes Task Force conducted a surveillance operation of known mailboxes that have experienced mail thefts. Postal Inspector Chris MASSARI provided information that the mailboxes at 5995 N Teutonia Ave (City and County of Milwaukee) and 5521 W Center St (City and County of Milwaukee) had both been targeted and had mail stolen from them.

49. On April 23, 2023, at approximately 11:15 p.m., officers observed two males running eastbound on W Florist Ave towards N Teutonia Ave where there were known USPS mailboxes. Suspect 1 was tall, possibly 6'00" to 6'03" with a medium build, wearing dark pants, a dark hooded sweatshirt with the hood up, and possible writing on the front of the sweat shirt. Suspect 1 was later identified as ALLISON. Suspect 2, was short, possibly 5'05" to 5'07" wearing what appeared to be an Adidas jacket or sweatshirt. The jacket or sweatshirt was dark or black with stripes going down the shoulders ending at approximately the elbow area. Suspect 2 was later identified as ABDI.

50. ALLISON acted as a lookout as ABDI crouched down and opened the mailbox located at 5995 N Teutonia Ave. The mailboxes can only be opened with an Arrow Key. The suspects removed what appeared to be mail from the mailbox and then fled westbound on W Florist Ave where they got into a vehicle parked on the south side of W Florist St in the 3400 block and then fled westbound in a dark colored Chevrolet Malibu, with no rear plate.

51. At approximately 12:00 a.m., FBI Analyst Emily SLAJUS observed via a live stream video feed, the same two subjects go to the mailboxes at the post office located at 5521 W Center Street, in Milwaukee, open the mailboxes, appear to take the mail, and then flee. FBI Analyst Slajus then communicated this to undercover MAVCTF surveillance units. Task Force Officer Michael SKEMP (Brookfield PD) and Special Agent Ian BYRNE were in an undercover vehicle and were travelling north on Sherman Blvd from W Wright St and responded to the area. TFO SKEMP called out the vehicle over Milwaukee Police Radio and a traffic stop was conducted.

52. The driver of the vehicle was identified as ALLISON and the front passenger seat was identified as ABDI. ABDI and ALLISON were arrested and taken into custody without incident. Following a search of ALLISON's person for officer safety, an Arrow Key with serial number 77-32733 on it was located in ALLISON's front left pocket which matched the key stolen during the March 13th armed robbery. The Chevrolet Malibu's listed owner was ABU and was registered to the address of 2519 N Buffum Street. Inside of the glovebox of the Malibu were two pieces of mail addressed to ABU. A search of the vehicle was conducted by members of the MAVCTF. In the front passenger seat, where ABDI had been seated, were two large black plastic garbage bags containing approximately 400-500 pieces of mail, multiple bank cards, two personal checks, and a box of black garbage bags in the trunk of the vehicle.

53. On Monday, April 24, 2023, members of the MAVCTF observed ABU exit the Clark gas Station located at 2242 N. 12th Street in Milwaukee and enter a light blue Chrysler 200 with no plates. ABU was observed entering the driver's seat of the vehicle and drove east on North Avenue. A traffic stop of the Chrysler was conducted and ABU was taken into custody without incident.

54. In a Mirandized interview, ALLISON admitted to being a part of the robbery on March 13, 2023 at 4548 N 38th St in the City and County of Milwaukee. He said that robbery occurred because a few nights prior ABDI was using a different Arrow Key to get mail from mailboxes and the key broke off in the mailbox. ALLISON stated ABU was extremely upset about this and threatened ABDI to get another key. ALLISON explained ABU was known as "The Don" and was the leader of this group that steals mail, alters and cashes checks and robbed mail carriers for their USPS Arrow Keys. ALLISON stated that they refer to ABU as "the Don" but ABU preferred to be called "Wiz.". Following ALLISON's arrest, ALLISON's phone was recovered in the console of the vehicle and during the search of the vehicle, ALLISON was receiving a number of missed telephone calls from an individual saved in ALLISON's phone as "Wiz". ALLISON stated he believed that ABU would have hurt or killed ABDI if he did not get a new key.

55. ALLISON further stated that on March 13, 2023 he had met up with ABDI, ABU, LAZARUS JONES and DESHAWN ROBINSON. ALLISON stated that he was driving the Honda and ABDI was in the back seat while ABU followed them in a Malibu. ALLISON stated that they drove around and eventually found a mail carrier. ALLISON stated that ABU then got into the Honda and JONES got into the Malibu. ALLISON stated that they then circled back around and he (ALLISON), ABDI, and ROBINSON went and robbed the mail carrier at gunpoint. ALLISON stated that ABDI had a Draco styled pistol that had been provided by ABU. ALLISON

said ABDI found the key in the mail carriers' bag and pulled them out. After taking the keys, ALLISON stated that ABDI "racked" the Draco AK-47 and was scared that ABDI was going to shoot the mail carrier. ALLISON stated that they ran back to the vehicle after doing the robbery. ALLISON stated that as soon as they entered the vehicle, ABDI handed over the Arrow Key and the Draco styled pistol back to ABU. ALLISON stated that ABDI and ABU were all laughing about the robbery then. ALLISON said they did the robbery under the direction of ABU.

B. Initial Social Media Investigation and Additional Suspects

56. In a mirandized interview, ABU admitted to being present for the March 13th armed robbery and admitted knowing there would be a robbery for an Arrow Key. ABU also admitted to being the driver and look out during the December 7, 2022 armed robbery. ABU further admitted being present for the February 10, 2022 armed robbery and acknowledged that an Arrow Key was taken. ABU stated that BABA had approached ABU regarding obtaining a mail key from a postal carrier on February 10, 2023, and that BABA had participated in the robbery of the mail carrier on that date. ABU stated several times during the interview that he did not commit the robberies but that he was "party to a crime." ABU provided a consent to search for the cellular phone that was seized from his person at the time of his arrest.

57. Following his arrest, ABU's jail calls were monitored by members of the MAVCTF. During one of the monitored jail calls, ABU references his Instagram Accounts to a female caller in an attempt to have her login. ABU stated that his Instagram account **username** was "**29.wiz**". It was determined that this Instagram account had an **Instagram ID#** "**31452828829**". This profile was publicly available and had a most recent public activity of June 2, 2022.

58. On April 11, 2023, a federal grand jury in the Eastern District of Wisconsin, issued a two-count indictment against HAJI for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a) and on June 27, 2023, a federal grand jury issued a nine count superseding indictment against ABU, COOK, HAJI, ABDI, and ALLISON, for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a), and Title 18, United States Code, Sections 1708.

59. On May 15, 2023, I swore to an affidavit requesting the authorization of a search warrant for the social media account identified by ABU as his Instagram account,” **Instagram ID# “31452828829”**, as well as others, and on May 15, 2023, the search warrant was granted. On June 7, 2023, the warrant return was received.

60. On August 29, 2023, members of the MAVCTF responded to an armed robbery complaint of a USPS postal carrier near 1833 W. Galena Street, Milwaukee, Wisconsin. The victim, hereinafter referred to as D.W., stated that at approximately 12:20 p.m. that day, he was approached by (5) five armed suspects that demanded his USPS keys. D.W. stated that he was delivering mail near 1833 W. Galena Street, Milwaukee, when he observed an older, dirty, white Nissan sedan park south of 1901 W. Galena Street. As D. W. approached his vehicle, he heard approaching footsteps behind him. D.W. Stated that he heard one of the subject tell him “don’t move”. D.W. turned and observed five armed subjects. D.W. described Subject #1 as a black, male, approximately 15-19 years old, approximately 5’8”-5’9”, slender build, wearing a full black balaclava style mask covering his head, face and neck, and a black hooded sweatshirt with the hood up. D.W. stated that Subject #1 was armed with silver over black handgun described by D.W. as a possible Taurus G2. D.W. described Subject #2 as a black male, approximately 15-19 years

old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a black hooded sweatshirt with the hood up. D.W. stated that Subject #2 was armed with a handgun. D.W. described Subject #3 as a black male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a gray hooded sweatshirt with the hood up. D.W. stated that Subject #3 was armed with a handgun. D.W. described Subject #4 as a black male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a gray hooded sweatshirt with the hood up. D.W. stated that Subject #4 was armed a handgun. D.W. described Subject #5 as a black male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a gray hooded sweatshirt with the hood up. D.W. stated that Subject #5 was armed with a handgun.

61. D.W. stated that Subject #1 was armed with a silver over black gun which was held pointed at D.W.'s head while standing directly in front of him. D.W. stated that Subject #2 and Subject #3 approached D.W. and maintained a position directly to his left and right side. D.W. stated that Subject #2 then demanded D.W.'s keys. D.W. stated that he asked if the subjects wanted his USPS scanner or his cell phone and the subjects said no, they just wanted his keys. D.W. stated that Subject #2 then reached over and retrieved the keys off of D.W.'s belt loop on his right side. D.W. stated that Subject #4 was positioned directly behind Subject #1 and was armed but did not engage with D.W.. D. W. stated that Subject #5 was standing with Subject #4 behind Subject #1. D.W. stated that after Subject #2 took control of D.W.'s keys, Subject #4 retreated to the vehicle. D.W. stated that shortly after Suspect #4 left, Subject's #1, #2, #3 and #5 all fled on foot to the same vehicle which had pulled into the intersection of N. 19th Street and W. Galena Street, facing

northbound. D.W. observed the suspect vehicle as a white Nissan Altima that he estimated was a late 2000's model. D.W. was not able to obtain a vehicle registration plate. D.W. stated that the vehicle was very dirty and needed a car wash.

62. Following the reported armed robbery, another USPS postal carrier, hereinafter D.A., reported to law enforcement that she had been in the area of N. 23rd Street and W. Galena Street shortly after 12:20 p.m., when a dirty, white, Nissan sedan, with extremely dark tinted windows, turned south on N. 23rd Street from W. Galena Street, at a high rate of speed.

63. I am aware that 2303 W. Cherry Street is located 0.1 Miles away from the intersection of N. 23rd Street and W. Galena Street and the route of travel to get to 2303 W. Cherry Street from N. 23rd and W. Galena would be south on N. 23rd Street. At 3:01 p.m., on August 29, 2023, a drive by of 2303 W. Cherry Street was done by members of the MAVCTF and the white Nissan Altima, bearing WI plate AJF-7039 was observed parked on the parking slab of the residence. It should be noted that the vehicle has extremely dark tinted windows and was noticeably dirty.

64. Also following the robbery, on August 28, 2023, a check of FLOCK and ALPR vehicle images was done for the Nissan bearing WI plate AJF-7039. The return of the check included an ALPR hit of the vehicle on August 29, 2023, at 11:04 a.m., in the area of N. 35th and W. Center Street.

65. On September 1, 2023, I swore to an affidavit requesting authorization of a Timing Advance "True Call" area search warrant for all records and unique device/user identifiers pertaining to the Timing Advance location information from the August 29th ALPR hit, around the time of 11:04 a.m., from the area of N. 35th Street and W. Center Street, the August 29th armed robbery location of 1833 W. Galena Street, around the time of 12:20 p.m., and from the area of

2303 W. Cherry Street, around the time of 3:01 p.m., after the armed robbery took place and the location the white Nissan Altima was observed parked at the location. The warrant was authorized, served and on or about September 1, 2023, and the results were received from T-Mobile on September 15, 2023.

66. Upon receipt of the results received on November 15, 2023. I was able to compare the information from both search warrants to the associated requested locations. There appeared to be a specific IMSI identified, IMSI 310260671044146, via the return, that was consistent with being in the geographic areas consistent with and around the report times of the below listed events. An IMSI is identified as the international Mobile Subscriber Identity which is a number that identifies a single unique customer in the T-Mobile network. The IMSI is similar to a driver's license in identifying the single user and is also related to a single telephone number on the network.

67. The IMSI did not have any records in the return or search for the August 29, 2023 postal carrier armed robbery around 12:20 p.m. The closest record was at approximately 12:26 p.m. in the area around the address of 2303 W Cherry where the Nissan Altima had been observed. I noted that these two locations are in close proximity and that a vehicle can travel between the two points within the approximate 6 minutes

68. On October 5, 2023, I swore to an affidavit requesting the subscriber information for the identified IMSI referenced above and on October 5, 2023, the search warrant was granted by the Honorable Magistrate Judge Nancy Joseph. On October 6, 2023, I received the results of that search warrant from T-Mobile indicating that the phone number associated to IMSI 310260671044146, was cellular telephone number 414-501-0101.

69. On October 10, 2023, I was able to search the Instagram return obtained on June 7, 2023, from Facebook, belonging to ABU, for the telephone number 414-501-0101, as well as previously-searched cellular phone downloads for the contact number 414-501-0101. The phone number was located in the telephone download of HAJI's phone associated to the telephone number 262-364-4059, which was seized during the January 27, 2023 search warrant executed at 2519 N. Buffum Street, and saved as contact "Big Bro Trigga (emoji)". The phone number was also identified within ABU's Instagram return and ABU identified the number 414-501-0101 as belonging to "trigg" on June 30, 2022. On December 29, 2023, ABU had the following chat with the Instagram ID 1379990481, with the user name: "bmsm_east", which was identified and confirmed to be the Instagram account associated to COOK:

Author bmsm_east (Instagram: 1379990481)
Sent 2022-12-29 08:42:06 UTC
Body Scamilly sent an attachment.

Author rio.dinerojr (Instagram: 31452828829)
Sent 2022-12-29 16:41:13 UTC
Body 4145010101

Author rio.dinerojr (Instagram: 31452828829)
Sent 2022-12-29 16:41:47 UTC
Body You sent a photo.

Attachments image-944771610030045 (944771610030045)
Type image/jpeg
Size 15008
URL https://interncache-ftw.fbcdn.net/v/t1.15752-9/321978272_944771620030044_8253259414678991259_n.jpg?ccb=1-7&_nc_sid=73a6a0&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9pbW9nZW46RFJlTWVkaWVudGlscyJ9&_nc_ad=z-m&_nc_cid=0&_nc_ht=interncache-ftw&oh=03_AdRuhgt08tgpL2uQxR1YRY1Z3uNvWPiRvNow2E9tjv75ZQ&oe=64417FDA



Photo ID 944771610030045

Author bmsm_east (Instagram: 1379990481)
Sent 2022-12-29 16:43:04 UTC
Body Wats the name

Meta Platforms Business Record

Author

rio.dinerojr (Instagram: 31452828829)

Sent 2022-12-29 16:43:21 UTC

Body Abdi baba

Author bmsm_east (Instagram: 1379990481)

Sent 2022-12-29 17:26:00 UTC

Body Tell trig send it to me

70. I also searched ABU's Instagram for the name "Trigg" and identified **Instagram ID 33244824003**. This Instagram ID had the Instagram username "Chickenchaser_trigg" on March 29, 2023. This Instagram account had multiple chats with ABU's account regarding "slips", a term I know to mean stolen checks, an "arrow key", and a conversation where I believe them to be discussing the robbery of a mail carrier on or around March 28, 2023. I know there to have been a robbery of a mail carrier on March 28, 2023, at 4616 W. Hope Avenue, Milwaukee, Wisconsin. During the conversation, on March 29, 2023, "Chickenchaser_trigg" accuses ABU of "bussing moves" without him. I know the term "bussing moves" or "busting moves" to mean conduct illegal activity such as conducting an armed robbery. ABU denies it and "Chickenchaser_trigg" states he was "part of the plan" and didn't get anything out of it. ABU states that he doesn't know anything about an arrow key. "Chickenchaser-trigg" then appears to reference a time where they were conducting an armed robbery and "Chickenchaser_trigg" was the driver. ABU then says that "chickenchaser_trigg" made them walk 3 blocks after the robbery. "Chickenchaser_trigg" says that he was parked in the same spot that they left and that ABU was supposed to be selling him "a slip that same day". "Chickenchaser_trigg" then states "So the driver don't get no Years the niggah that made sure y'all got away". AU replies "He parked behind a garbage tf thy giving him years for" and "I'm giving you slips." "Chickenchaser_trigg" states "You don't give me no slips" "I buy slips."

71. This Instagram number had the Username “Chickenchaser_trigg” as well as the Username “ypn_trigg”. I then searched on Instagram for the two usernames and identified the Instagram Username “ypn_trigg” with a profile picture of an individual that appeared to be BABA wearing sunglasses. The rest of the information regarding the Instagram was private and could not be viewed publicly. I also searched Facebook for the two usernames as well and located a Facebook profile “ypn trigg” This Facebook profile was open and publicly available. A view of the photographs posted on this Facebook account were also of BABA. Milwaukee Police Detective Anne Portnoy requested that a facial recognition of the photographs posted to the Facebook Account to a booking photograph of BABA and the result was a one hundred percent match.

72. On October 23, 2023, I swore to an affidavit requesting authorization for a search warrant for the Instagram account associated to Instagram ID: **33244824003** and it was authorized by the Honorable United States Magistrate Judge Nancy Joseph. The warrant was served upon Meta Platforms, Inc on October 24, 2023 and the results were downloaded from the Facebook law enforcement portal on October 26, 2023.

73. On October 30, 2023, I swore to an affidavit requesting authorization for a search warrant for the home address of BABA, located at 2303 W. Cherry Street, Milwaukee, Wisconsin. The warrant was authorized by the Honorable United States Magistrate Judge Nancy Joseph on October 30, 2023, and the warrant was executed at the residence on November 8, 2023. During the execution of the search warrant, the FBI and member of the MAVCTF located several items, including but not limited to, a Glock 19 Firearm, bearing SN: BUYE391, (12) 9mm rounds located inside the magazine which was inserted into the firearm, (3) firearm magazines, a set of UPS keys located on a lanyard, a USPS mail carrier satchel, and (2) USPS keys, including an arrow key

bearing SN: 77-30968, which matched the Serial number of the arrow taken from the mail carrier during the August 29, 2023 armed robbery.

C. Statement of ABDI BABA and identification of co-actor social media accounts

74. BABA was taken into custody by the Milwaukee Police Department due to a Suspect Alert which was entered by Detectives from the Milwaukee Police Department regarding the February 10, 2023 armed robbery in which BABA's vehicle was identified as the suspect vehicle. During the interview of BABA, he admitted to being the driver for the February 10, 2023 armed robbery of the postal carrier. BABA also admitted to being the driver in the August 29, 2023 armed robbery of the postal carrier that occurred at 1833 W. Galena Street in Milwaukee. BABA stated that although BABA was the driver, the robbery was organized by an individual ABDI MOHAMED. BABA stated that MOHAMED went by the name "Monnie_low" on Instagram and was BABA's cousin. BABA described MOHAMED as a black, male, approximately 26 or 27 years of age, and thin build. BABA stated that BABA picked up MOHAMED and two other unknown black males the day of the robbery. BABA stated that MOHAMED and the two other black males had guns. BABA stated that he parked his vehicle and MOHAMED and the two unknown males approached the mail carrier and took the carrier's keys and belongings. BABA was shown a photo of the mail truck from the robbery and confirmed that this was the mail truck they robbed. BABA stated that he drove directly to his house located at 2303 W. Cherry Street and MOHAMED left the firearm and keys at his residence. BABA stated that the firearm recovered by the FBI was the firearm MOHAMED used during the August 29, 2023 armed robbery.

75. I viewed and searched BABA's Instagram return for the name "monnie_low" and located an Instagram account "monnie_low_official" with the Instagram ID: 318462056". I

located the Instagram account and preserved the account on November 17, 2023. A review of the live profile determined that the last two Instagram posts was a list of the names of various banks. It was also observed that this Instagram account was following Instagram profiles used by or associated to previously identified postal carrier subjects and/or associates. On 11/17/2023, a query of law enforcement databases for the name ABDI MOHAMED, identified a subject ABDI MOHAMED, dob: XX/XX/1996. A visual comparison between the photos on the Instagram account “monnie_low_official” with the Instagram ID: 318462056, and the individual ABDI MOHAMED, XX/XX/1996, determined that they were visually similar and likely the same person.

76. Additional research was also done for additional Instagram accounts associated to MOHAMED and several were located, including the Instagram account “monnie_53212” with Instagram ID: 60277130021, Instagram account “moinee_low_” with Instagram ID: 2151583950, and Instagram account “monnielow” with Instagram ID: 35582377580. The Instagram account “monnie_53212” with Instagram ID: 60277130021 was last updated on November 20, 2023 and depicted photos that were similar and likely the same ABDI MOHAMED. On November 20, 2023, there was a photo posted of MOHAMED with two others where the other two are holding a firearm and cash. Also, on November 20, 2023, there is a photo posted of MOHAMED, wearing a blue and white Nike zip-up hooded jacket, holding a rifle style firearm with a large, clear magazine clip where unfired rounds are able to be observed within the magazine. The Instagram account “moinee_low_” with Instagram ID: 2151583950 was last updated on September 6, 2020, also depicted photos of the same ABDI MOHAMED. The profile picture for this account was a photo of MOHAMED pointing a gun at the camera. Other photos show MOHAMED with a silver pistol in hand and a video of four black males, including MOHAMED, riding inside a vehicle, with MOHAMED holding a black firearm posted on December 3, 2019. The Instagram account

“monnielow” with Instagram ID: 35582377580 was last updated on June 24, 2020 and had photos of the same ABDI MOHAMED but had minimal activities.

77. I also searched the Instagram return I received for ABU’s Instagram and located the **Instagram ID: 318462056**. The chats between ABU and “monnie_low_official” are between June of 2022 and April of 2023. All of the chats discuss check cashing and bank account sharing. Pictures are shown of deposit receipts as well. For example, on March 3, 2023, ABU sends a message to “monnie_low_official” “Meet at the low spot” “Dropping in the us bank”. “Monnie_low_official” responds “It’s his play but it’s money involved Way” “the apartments by the east?” ABU states “By park” and sends a photo of a UW Credit Union Receipt of a check deposit on March 13, 2023 at 12:06 pm at 6016 N. Port Washington Rd, Glendale WI ATM: 670202 for \$6,918.00. “Monnie_low_official” states “I like that.”

78. I also located an Instagram account on ABU’s Instagram return “maz.low” with **Instagram ID: 2084990160**. There are hundreds of chats between ABU and “maz.low” beginning in June of 2022 through April of 2023, discussing “slips” as well as exchanging bank account information, exchanges of screen shots of deposit slips, checks not addressed to either ABU nor MOHAMED, deposit receipts, websites of bank balances, and a majority of their discussions involve discussions regarding when checks will clear and what banks allow cashing of checks in a timely manner. There is also a discussion found between ABU and “maz.low” where ABU asked “maz.low” where he gets his slips. “Maz.low” says he gets his slips “from his bitch” but he is “looking for a mail guy tho.” Due to the involvement of **Instagram ID: 2084990160** with ABU in the check fraud from early on in 2022 and the similar profile name of “maz.low” with the other accounts such as “moine_low” and monnie_Low_official” that contain photos of MOHAMED, I believe that the Instagram account “Maz_low” may be an account associated to MOHAMED.

79. Based on the above information, I am requesting to obtain a search warrant for the information from the accounts associated with the **Instagram ID: 318462056**, **Instagram ID: 2084990160**, **Instagram ID: 60277130021**, and **Instagram ID: 2151583950**.

INSTAGRAM AND FACEBOOK ACCOUNT PRESERVATIONS

80. On November 17, 2023 writer submitted a preservation request to Meta Platforms, Inc. via the Facebook law enforcement portal for the **Instagram ID: 318462056** and **Instagram ID: 2084990160**. Also on November 17, 2023, FBI analyst Rhaoda Thao submitted a preservation request to Meta Platforms, Inc. via the Facebook law enforcement portal for the **Instagram ID: 60277130021**.

TECHINICAL INFORMATION

81. Based on my training and experience, I am aware that individuals involved in criminal activity, including violent offenses with firearms, have also used websites and third-party applications, such as Facebook and Instagram, to communicate regarding their illegal activity and flaunt illegal firearms.

82. Meta Platforms, Inc. owns and operates the free-access social networking websites called Facebook and Instagram that can be accessed at <http://www.facebook.com> and <http://www.Instagram.com> respectively. Facebook/Instagram allow its users to establish accounts with Facebook/Instagram, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook/Instagram users, and sometimes with the general public.

83. Facebook/Instagram asks users to provide basic contact and personal identifying information to Facebook/Instagram, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses,

Facebook/Instagram passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook/Instagram also assigns a user identification number to each account.

84. Facebook/Instagram also collects and retains information about how each user accesses and uses Facebook/Instagram. This includes information about the IP addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations.

85. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if “added” to the primary account, can switch between the associated accounts on a device without having to repeatedly log in and log out.

86. Instagram users can also connect their Instagram and Facebook accounts to use certain cross-platform features, and multiple Instagram accounts can be connected to a single Facebook account. Instagram accounts can also be connected to certain third-party websites and mobile apps for similar functionality. For example, an Instagram user can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a connected Facebook account, or transfer an image from Instagram to a connected image printing service. Facebook maintains records of changed Instagram usernames, associated Instagram accounts, and previous and current connections with accounts on Facebook and third-party websites and mobile apps.

87. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual

Facebook users by sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the request, then the two users will become “Friends” for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user’s account includes a list of that user’s “Friends” and a “News Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

88. Instagram users can “follow” other users to receive updates about their posts and to gain access that might otherwise be restricted by privacy settings (for example, users can choose whether their posts are visible to anyone or only to their followers). Users can also “block” other users from viewing their posts and searching for their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen their comments. Instagram also allows users to create a “close friends list” for targeting certain communications and activities to a subset of followers.

89. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

90. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,”

such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.

91. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook's purposes, the photos and videos associated with a user's account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

92. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

93. If a Facebook user does not want to interact with another user on Facebook, the first user can "block" the second user from seeing his or her account.

94. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

95. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

96. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

97. Instagram users have several ways to search for friends and associates to follow on Instagram, such as by allowing Facebook to access the contact list on their devices to identify which contacts are Instagram users. Facebook retains this contact data unless deleted by the user and periodically syncs with the user’s devices to capture changes and additions. Users can similarly allow Facebook to search an associated Facebook account for friends who are also Instagram users. Users can also manually search for friends or associates

98. Each Instagram user has a profile page where certain content they create and share (“posts”) can be viewed either by the general public or only the user’s followers, depending on the privacy settings. Users can customize their profile by adding their name, a photo, a short biography (“bio”), and a website address.

99. One of Instagram’s primary features is the ability to create, edit, share, and interact with photos and short videos. Users can upload photos or videos taken with or store on their

devices, to which they can apply filters and other visual effects, add a caption, enter the usernames of others (“tag”), or add a location. These appear as posts on the user’s profile. Users can remove posts from their profiles by deleting or archiving them. Archived posts can be reposted because, unlike deleted posts, they remain on Facebook servers.

100. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Users receive notification when they are “tagged” in a post by its creator or mentioned in a comment (user can “mention” others by adding their username to a comment followed by “@”). An Instagram post created by one user may appear on the profile or feeds of other users depending on several factors including privacy settings and which users were tagged or mentioned.

101. An Instagram “story” is like a post but can be viewed by other users for only 24 hours. Stories are automatically saved to the creator’s “Story Archive” and remain on Facebook servers unless manually deleted. The usernames of those who viewed a story are visible to the story’s creator until 48 hours after the story was posted.

102. Instagram allows users to broadcast live video from their profiles. Viewers can like and add comments to the video while it is live, but the video and any user interactions are removed from Instagram upon completion unless the creator chooses to send the video to IGTV, Instagram’s long-form video app.

103. Instagram’s direct messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, profiles, and other information. Participants to a group conversation can name the group and send invitations to other to join. Instagram users can send individual or group messages with “disappearing” photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders can’t

view their disappearing messages after they are sent but do have access to each message status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat with each other directly or in groups.

104. Instagram offers services such as Instagram Checkout and Facebook Pay for users to make purchases, donate money, and conduct other financial transactions within the Instagram platform, Facebook, and other associated websites and apps. Instagram collects and retains payment information, billing records, and transactional and other information when these services are utilized.

105. Instagram has a search function which allows users to search for accounts by username, user activity by location and user activity by hashtag. Hashtags, which are topical words or phrases preceded by a hash sign (#), can be added to posts to make them more easily searchable and can be “followed” to generate related updates from Instagram. Facebook retains records of a user’s search history and followed hashtags.

106. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

107. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

108. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile,

that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

109. Facebook collects and retains location information relating to the use of an Instagram account, including user-entered location tags and location information used by Facebook to personalize and target advertisements.

110. Social networking providers like Meta Platforms, Inc. typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook or Instagram users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Meta Platforms, Inc. typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

111. As explained herein, information stored in connection with a Facebook or Instagram account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook or Instagram user's IP log, stored electronic communications, and other data retained by Meta Platforms, Inc., can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing,

such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook or Instagram account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses; investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Lastly, Facebook or Instagram account activity may provide relevant insight into the Facebook/ Instagram account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook/ Instagram account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

112. Therefore, the computers of Meta Platforms, Inc. are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook/Instagram, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

113. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Meta, Inc. to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

114. Based on the foregoing, I request that the Court issue the proposed search warrant.

115. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Meta Platforms, Inc. Because the warrant will be served on Meta Platforms, Inc., who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

116. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

117. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the **Instagram ID: 318462056**, **Instagram ID: 2084990160**, and **Instagram ID: 60277130021** that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1 Meta Way, Menlo Park, California, 94025.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Meta Platforms, Inc.

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta Platforms, Inc. (“Meta”), regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each user ID listed in **Attachment A**:

- (a) All contact and personal identifying information, including the full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers for user Account Name with the Usernames and Account IDs listed in **Attachment A**.
- (b) All activity logs for the account and all other documents showing the user’s posts and other Facebook or Instagram activities from **January 1, 2022, to present**;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;
- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook/Instagram group

identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook/Instagram applications;

- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user from **January 1, 2022 through present**, including all Messenger activity, private messages, chat history, video and voice calling history, and pending “Friend” requests;
- (g) All “check ins” and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account’s usage of the “Like” feature, including all Facebook/Instagram posts and all non-Facebook webpages and content that the user has “liked”;
- (j) All information about the Facebook pages that the account is or was a “fan” of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account from **January 1, 2022 through present**;
- (m) All information about the user’s access and use of Facebook Marketplace;
- (n) The types of service used by the user;

- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (p) All privacy settings and other account settings, including privacy settings for individual Facebook/Instagram posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook/Instagram and any person regarding the user or the user's Facebook/Instagram account, including contacts with support services and records of actions taken.
- (r) All content (whether created, uploaded, or shares by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), image stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from **January 1, 2022 to present.**
- (s) All content, records, and other information relating to communications sent from or received by the accounts in Attachment A including by not limited to:
 - a. The content of all communications sent from or received by the Accounts listed in Attachment A, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available.
 - b. All records and other information about direct, group, and disappearing messages sent from or received by the Accounts listed in Attachment A including dates and times, methods, sources, and destinations (including

usernames and account numbers), and status (such as delivered, opened, replayed, screenshot)

- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants
- d. All associated logs and metadata,
- (t) All content, records, and other information relating to all other interactions between the Accounts listed in Attachment A and other Instagram users from **January 1, 2022** through **present** including but not limited to:
 - a. Interactions by other Instagram users with the Accounts listed in Attachment A or its content, including posts, comments, like, tags, follows (including follows unfollows, approved and denied follow requests, and blocks and unblocks), shares invitations, and mentions
 - b. All users the Accounts listed in Attachment A has followed including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the account
 - c. All contacts and related sync information
 - d. All associated logs and metadata

Meta is hereby ordered to disclose the above information to the government within 10 days of issuance of this warrant.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. § 1951(a) (Hobbs Act robbery), 18 U.S.C. § 924(c) (possessing and/or brandishing a firearm during a crime of violence) involving ABDI MOHAMED, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- (a) The relevant offense conduct, any preparatory steps taken in furtherance of the scheme, communications between HUSSEIN HAJI, HURIA ABU, JESSIE COOK, ABDI BABA, ABDI MOHAMED and others related to the relevant offense conduct of illegal use and possession of firearms and carjacking;
- (b) Evidence indicating how and when the Facebook/Instagram account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook/Instagram account owner;
- (c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s); and
- (e) The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the sale of firearms and sale and use of controlled substances, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits,

and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.